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April 22, 2016

Becca Conklin  
Department of Ecology  
Water Quality Program  
P.O. Box 47600  
Olympia, WA 98503-7600

RE: Proposed Amendments to Surface Water Standards  
Chapter 173-201A WAC

Dear Ms. Conklin:

The Manufacturing Industrial Council is comprised of companies located primarily in the City of Seattle, with a large concentration of members operating in or near the site of the Duwamish River Superfund. Our input on the Department of Ecology proposal for changes to water quality rules is based on our collective experiences with the Superfund and other activities involving stormwater and water quality issues. We are concerned that the proposed rule will impose unattainable goals for water quality permits and in-water cleanup projects that will result in a significant loss of family wage jobs in an area that routinely ranks among the top five export production centers in the nation.

The Duwamish Superfund model demonstrates the practical progress that can be achieved through a local collaboration adapted to local conditions. Real cleanup is occurring through these efforts, producing environmental and health benefits for all who work, live or fish in the Duwamish watershed.

We urge Ecology and the Environmental Protection Agency to take the time necessary to develop a similar, more collaborative approach to water quality rules and fish consumption. In our view, the present DOE and EPA proposals will result in a top-down, one-size fits-all effort that is highly likely to result in the type of prolonged disputes that hamstringing the Portland Harbor superfund in Oregon. In contrast, the Duwamish model is literally producing cleaner fish sooner.

Washington state is home to a wide variety of marine environments. We urge you to pursue water quality rules that can be adapted to local conditions.

Sincerely,

Dave Gering, Executive Director  
Manufacturing Industrial Council